

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA ) Criminal No. 1:22-CR-477 (GTS)  
v. )  
DWIGHT A. SINGLETARY II, et al. )  
Defendants. )  
) STIPULATION AND ORDER  
FOR CONTINUANCE  
)

The attorneys for the defendants referenced below having moved for a continuance of 210 days within which the parties may complete discovery, file motions, and prepare for trial in the above-captioned action and Carla B. Freedman, United States Attorney for the Northern District of New York, Cyrus P.W. Rieck and Dustin C. Segovia, Assistant U.S. Attorneys, appearing, having consented to the continuance and proposed the exclusion of the additional 210-day period of continuance under the Speedy Trial Act, the parties hereby stipulate and agree as follows:

- 1) The prior proceedings in this case occurred as follows:
  - a) Date of arraignment of first defendants: January 4, 2023
  - b) Date of indictment: December 21, 2022
  - c) Defendants' custody status: certain defendants detained; others released on conditions.
- 2) The Court has not previously ordered any exclusions under the Speedy Trial Act.
- 3) The defendants referenced below have requested a continuance based on the following facts and circumstances:
  - a) On December 21, 2022, a grand jury in this District returned a 99-count indictment charging 24 defendants with various offenses including, (Count 1) conspiracy to manufacture, distribute, and possess with intent to distribute controlled substances, in violation of 21 U.S.C.

§§ 846, 841(a)(1), (b)(1)(A), (B), (C), and (D); (Count 2) maintaining a drug-involved premises, in violation 21 U.S.C. § 856(a)(1); (Counts 3-4, 6, and 9) possession with intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and (D); (Counts 5 and 8) possession of firearms and ammunition by a prohibited person, in violation of 18 U.S.C. § 922(g)(1); (Counts 7 and 10) possession of firearms in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c)(1)(A); (Count 11) conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h); (Counts 12-82) money laundering, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); (Counts 83-98) transactions in criminally derived property, in violation of 18 U.S.C. § 1957(a); and (Count 99) false statements, in violation of 18 U.S.C. § 1001(a)(2).

b) Eleven of 24 defendants have appeared before the Court; the remaining defendants have not appeared or been arrested.

c) The parties stipulate and agree that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendants in a speedy trial because the case is so unusual or complex, due to the number of defendants, the nature of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by 18 U.S.C. § 3161.

d) The allegations in the indictment pertain to an alleged marijuana and tetrahydrocannabinols (THC) trafficking conspiracy, and a related money laundering conspiracy, that involved the shipment of thousands of kilograms of marijuana from Fresno, California, to locations throughout the United States, including the Capital Region of New York. The proceeds from the marijuana and THC trafficking are alleged to have been laundered through a variety of means, including money transfers; cash and money order deposits into numerous bank accounts;

the transportation and delivery of cash; the purchase of cashier's checks; and real estate transactions. Both conspiracies are alleged to have existed from 2016 through June 2022; certain defendants are also charged with firearm and other offenses related to the conspiracies.

e) The discovery in this case is voluminous, and includes, among other things, (i) evidence obtained through over 25 search warrants executed on premises in Fresno and the Capital Region, including from over 90 seized electronic devices, including cellphones, computers, and surveillance systems; (ii) reports from the extraction of data from the seized electronic devices; (iii) the contents of over 17 iCloud accounts containing hundreds of thousands of text messages and other information; (iv) the contents of 19 Facebook and Instagram accounts, which contain hundreds of thousands of pages; (v) the contents of nine email accounts containing over 160,000 emails; (vi) records obtained for hundreds of financial accounts, including bank, brokerage, and Cash App accounts; (vii) video footage of over 100 transactions at various banks throughout the United States; (viii) real estate records for several properties in Fresno and the Capital Region; and (ix) shipping records from UPS, FedEx, and FedEx Ground pertaining to nearly 4,000 shipments between 2015 and June 2022.

f) Significant time and effort will be required for the defendants to review and analyze such a large amount of discovery. The number of defendants (24) and the nature of the allegations (a multi-jurisdiction drug trafficking and money laundering conspiracy spanning several years) also make it unreasonable to expect adequate preparation for pretrial proceedings and for the trial itself within the relevant time limits.

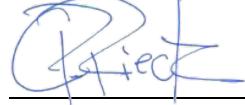
4) The parties stipulate and agree that a period of 210 days beginning on and including the date on which the Court signs the requested order shall be excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(ii).

The undersigned attorneys affirm under penalty of perjury the accuracy of the facts set forth above and apply for and consent to the proposed order set forth below.

Dated: January 16, 2023

CARLA B. FREEDMAN  
United States Attorney

By:

  
Cyrus P.W. Rieck  
Dustin C. Segovia  
Assistant United States Attorneys  
Bar Roll Nos. 518933 & 70016

Dated: January 17, 2023

  
Lee Carey Kindlon, Esq.  
Attorney for Dwight A. Singletary II  
Bar Roll No. 511642

Dated: January \_\_\_, 2023

Samuel C. Breslin, Esq.  
Attorney for McKenzie Merrialice Coles  
Bar Roll No.

Dated: January \_\_\_, 2023

Gennaro D. Calabrese, Esq.  
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Dated: January \_\_\_, 2023

Eric K. Schillinger, Esq.  
Attorney for Isiah Ti-Quan Clements  
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Dated: January \_\_\_, 2023

Timothy E. Austin, Esq.  
Attorney for Lawrence Mumphrey  
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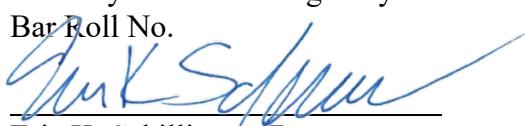
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Dated: January \_\_\_, 2023

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Bar Roll No.

Dated: January \_\_\_, 2023

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Elena Fast, Esq.  
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Dated: January \_\_\_, 2023

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Dated: January 12, 2023

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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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Dated: January 16, 2023

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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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Dated: January 17, 2023

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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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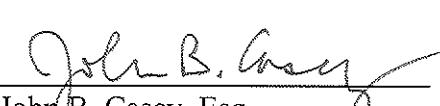
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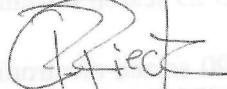
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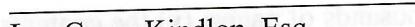
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CARLA B. FREEDMAN  
United States Attorney

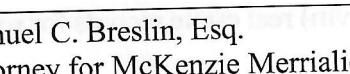
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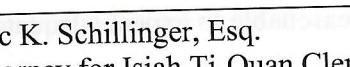
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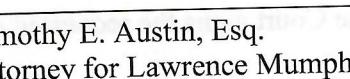
Dated: January 19, 2023

  
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Dated: January \_\_\_, 2023

  
Eric K. Schillinger, Esq.  
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Dated: January \_\_\_, 2023

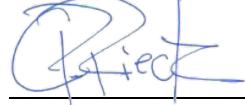
  
Timothy E. Austin, Esq.  
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Cyrus P.W. Rieck  
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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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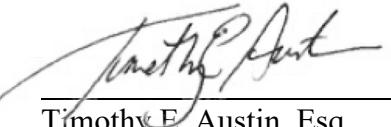
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Dated: January 19, 2023

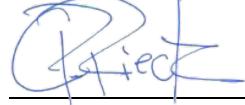
  
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Timothy E. Austin, Esq.  
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Dated: January 16, 2023

CARLA B. FREEDMAN  
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Cyrus P.W. Rieck  
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Dated: January \_\_\_, 2023

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Dated: January 20, 2023

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Dated: January \_\_\_, 2023

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Dated: January \_\_\_, 2023

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Eric K. Schillinger, Esq.  
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